



**THE CITY OF NEW YORK
LAW DEPARTMENT**

100 CHURCH STREET
NEW YORK, NY 10007

Hon. Sylvia O. Hinds-Radix
Corporation Counsel

Nicholas R. Ciappetta
Administrative Law and Regulatory Litigation
Division
(212) 356-4036
nciappet@law.nyc.gov

May 24, 2024

BY ECF

Honorable Steven L. Tiscione
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: William R. Nolan v. City of New York, et. al.
19-CV-00187 (RPK)(ST)

Dear Judge Tiscione:

I am an attorney in the office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York. I submit this letter on behalf of the City of New York, (Ret.) Chief Joseph Reznick, (Ret.) Chief Raymond Spinella, Inspector Michael Barreto, Captain Asif Iqbal, (Ret.) Detective James Butler, and Police Officer Bryan Burgess and Plaintiff William R. Nolan in connection with the parties' request that the Court So Order the attached (1) Stipulated Protective Order and (2) Stipulation and Order Regarding Clawback Agreement.

Respectfully submitted,

Nicholas Ciappetta
Senior Counsel